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UNITED STATES DISTRICT COURT

DISTRICT OF OREGON

PORTLAND DIVISION

**TIMOTHY MEACHAM,**

Plaintiff,

No. 3:15-CV-00338-SI

v.

**SPIRIT AIRLINES, INC. and; KERRIE  
CONRAD,**

**DEFENDANT KERRIE CONRAD'S  
UNOPPOSED MOTION FOR  
EXTENTION OF DEADLINE**

Defendants.

**CERTIFICATE OF COMPLIANCE WITH LR 7-1(a)**

I hereby certify that defense counsel for Defendant Kerrie Conrad ("Conrad") has conferred with counsel for Plaintiff in a good faith effort to resolve this matter. The parties agreed to the following request, and this motion is unopposed.

**MOTION**

Pursuant to LR 16-3, Defendant Conrad moves the Court for an extension of time to Tuesday, June 9, 2015, to file her Answer or otherwise respond to Plaintiff's Complaint.

**MEMORANDUM IN SUPPORT OF MOTION**

Defendant Conrad was served with the Summons and Complaint on April 16, 2015. Under the Federal Rules of Civil Procedure, Defendant's Answer is due on May 7. Defendant Conrad respectfully requests additional time to investigate the various claims in this matter and draft her Answer.

Defense counsel for Conrad spoke with William Ball, counsel for Plaintiff, on April 28, 2015, and requested a brief extension of time to prepare and file an Answer. Mr. Ball agreed with that request and Defendant Conrad seeks court approval of the extension of time in accordance with LR 16-3 and 29-1.

It is not expected that this requested extension of time will cause any significant delay in the progression of the action.

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This motion is made in good faith and not for purposes of delay. Defendant Conrad respectfully requests that the Court grant its request for an extension of time.

Dated this 29<sup>th</sup> day of April, 2015.

CHOCK BARHOUM LLP



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